

From: Scott Murray scott.murray@macgilllaw.com
Subject: Re: Hunt v. Southern Baptist Convention, et al.

Date: September 11, 2023 at 8:20 PM

To: Kathy Klein KKlein@rjfirm.com

Cc: robert.macgill@macgilllaw.com, patrick.sanders@macgilllaw.com, John.Jacobson@rjfirm.com, Steve.Mintz@mintzandgold.com, Terence.McCormick@mintzandgold.com, Scott.Klein@mintzandgold.com, Andy.Goldstein@colelawgroup.com, Todd.Cole@colelawgroup.com

Counsel -

In our prior emails, you stated that Guidepost would produce documents today, September 11. It is now past 7:00 p.m. CST, and we have not received anything. You also previously stated that Guidepost would work to produce a small subset of specific documents -- interview notes and recordings received from the complainant's husband -- prior to September 11. We have not received anything. Nor did we receive a response to my email from last week seeking an update.

It has now been 102 days since we served our initial requests for production, and we have not received a single document from Guidepost in response.

Please provide times for tomorrow (Tuesday, 9/12) when lead counsel is available to meet and confer.

Thanks.

Scott

Scott E. Murray

MacGill P.C.
 Inland Building - 12th Floor
 156 E. Market St.
 Indianapolis, IN 46204

Direct: 317.961.5408
 Mobile: 317.361.2151

On Thu, Sep 7, 2023 at 12:52 PM Scott Murray <scott.murray@macgilllaw.com> wrote:

Kathy et al. -

Any update?

Scott

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On Wed, Aug 30, 2023 at 11:42 AM Kathy Klein <KKlein@rjfirm.com> wrote:

Scott:

John is in depositions today and asked that I respond to your email. We are actively working with the client and the vendor to obtain the interview notes and recordings in advance of September 11, but we do not have a date certain at this time. We will update you as soon as we have more information.

Kathy

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From: Scott Murray <scott.murray@macgilllaw.com>

Sent: Tuesday, August 29, 2023 10:17 AM

To: John Jacobson <jjacobson@rjfirm.com>

Cc: Robert MacGill <robert.macgill@macgilllaw.com>; Andy Goldstein <agoldstein@colelawgroup.com>; Bunden, Brandon <bbunden@bradley.com>; DeDe Gibby <DDGibby@rjfirm.com>; Gene Besen <gbesen@bradley.com>; Kathy Klein <KKlein@rjfirm.com>; Matt Pietsch <matt@jpmblaw.com>; Nokes, Scarlett <snokes@bradley.com>; Patrick Sanders <patrick.sanders@macgilllaw.com>; Todd Cole <tcole@colelawgroup.com>; gmarchetti@jpmblaw.com; mccormick@mintzandgold.com; mintz@mintzandgold.com; jpresnell@bradley.com

Subject: Re: Hunt v. Southern Baptist Convention, et al.

John -

Do you have an update on when you can produce the interview notes and recordings referenced in your email?

Thanks.

Scott

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On Fri, Aug 18, 2023 at 6:51 PM John Jacobson <jjacobson@rjfirm.com> wrote:

Following up on our communications yesterday, the parties have known about the existence of audio recordings created by the survivor's husband since the Report was published by the SBC. As Steve Mintz made clear in his March 13 letter to your law partner, our client had those recordings in its possession. Further, Guidepost's August 17 response to your client's second set of interrogatories specifically identified the audio recordings and explained that the only audio recordings our client has in its possession are those it received from the survivor's husband. The response went on to provide that Guidepost planned to produce those recordings. While our team may have misread the original document requests Nos. 8-13 as to include only recordings created by Guidepost, our intent was not to mislead anyone regarding the existence of those recordings. My apologies if those responses created any unintended confusion.

Regarding the timing of my client's document production, I anticipate we will start producing documents by September 11. I hope to produce the interview notes and audio recordings before that date. Thereafter, we anticipate producing additional documents, including emails and text messages, on a rolling basis as those additional documents are reviewed.

I trust this email addresses your concerns. If you would like to discuss the matter further, I'm available for a call.

John

From: Scott Murray <scott.murray@macgilllaw.com>
Sent: Thursday, August 17, 2023 4:28 PM
To: John Jacobson <jjacobson@rjfirm.com>
Cc: Robert MacGill <robert.macgill@macgilllaw.com>; Andy Goldstein <agoldstein@colelawgroup.com>; Bundren, Brandon <bbundren@bradley.com>; DeDe Gibby <DGibby@rjfirm.com>; Gene Besen <gbesen@bradley.com>; Kathy Klein <KKlein@rjfirm.com>; Matt Pietsch <matt@tomblaw.com>; Nokes, Scarlett <snokes@bradley.com>; Patrick Sanders <patrick.sanders@macgilllaw.com>; Todd Cole <tc@colelawgroup.com>; gmarchetti@tomblaw.com; mccormick@mintzandgold.com; mintz@mintzandgold.com; tpresnell@bradley.com
Subject: Re: Hunt v. Southern Baptist Convention, et al.

John -

What time would work for a call today? I can make any time work.

Thanks.

Scott

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On Thu, Aug 17, 2023 at 4:29 PM John Jacobson <jjacobson@rjfirm.com> wrote:

Scott—I have some time late today and most of tomorrow to discuss the document production. I am not in a position, however, to commit to producing any responsive documents before Labor Day. As I explained in my email last week, our client is working with a vendor to assist in the document collection and review process. We anticipate producing responsive, non-privileged documents the week of September 4th. A Motion to Compel production is not necessary.

John

From: Scott Murray <scott.murray@macgilllaw.com>
Sent: Thursday, August 17, 2023 2:16 PM
To: John Jacobson <jjacobson@rjfirm.com>
Cc: Robert MacGill <robert.macgill@macgilllaw.com>; Andy Goldstein <agoldstein@colelawgroup.com>; Bundren, Brandon <bbundren@bradley.com>; DeDe Gibby <DGibby@rjfirm.com>; Gene Besen <gbesen@bradley.com>; Kathy Klein <KKlein@rjfirm.com>; Matt Pietsch <matt@tomblaw.com>; Nokes, Scarlett <snokes@bradley.com>; Patrick Sanders <patrick.sanders@macgilllaw.com>; Todd Cole <tc@colelawgroup.com>; gmarchetti@tomblaw.com; mccormick@mintzandgold.com; mintz@mintzandgold.com; tpresnell@bradley.com
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John and Guidepost Team -

We would appreciate the courtesy of a response.

Scott

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On Wed, Aug 16, 2023 at 11:09 AM Scott Murray <scott.murray@macgilllaw.com> wrote:

John -

Are you available today for a call?

We served our discovery requests on June 1, and we have not received any documents from Guidepost in response. From our perspective, there is no reason why Guidepost should not be able to start a rolling production

immediately by providing us with the notes from the interviews of the relevant parties (Pastor Johnny, the complainant, her husband, etc.) and communications with these individuals. The rest of Guidepost's production should follow shortly thereafter.

If we cannot get a commitment to the above and firm dates for substantial completion of production, we will file a motion to compel. Please let me know as soon as possible your side's availability for a meet and confer so that we can proceed with our motion.

Thanks.

Scott

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On Fri, Aug 11, 2023 at 5:51 PM John Jacobson <jjacobson@rjfirm.com> wrote:

Robert—I am happy to talk with you about the timing of my client's document production, but I cannot do it Monday. I am in Louisville for 2 depositions on Monday and will have the client with me all day. I will be back in the office Tuesday morning and can talk any time Tuesday except for a lunch meeting between 12-and 1:30 Central. Please let me know what works for you.

Thanks,

John

From: Robert MacGill <robert.macgill@macgilllaw.com>
Sent: Friday, August 11, 2023 11:55 AM
To: John Jacobson <jjacobson@rjfirm.com>
Cc: Andy Goldstein <agoldstein@colelawgroup.com>; Bundren, Brandon <bbundren@bradley.com>; DeDe Gibby <DDGibby@rjfirm.com>; Gene Besen <gbesen@bradley.com>; Kathy Klein <KKlein@rjfirm.com>; Matt Pietsch <matt@tjmlaw.com>; Nokes, Scarlett <snokes@bradley.com>; Patrick Sanders <patrick.sanders@macgilllaw.com>; Todd Cole <tcole@colelawgroup.com>; gmarchetti@tjmlaw.com; mccormick@mintzandgold.com; mintz@mintzandgold.com; scott.murray@macgilllaw.com; tjresnell@bradley.com
Subject: Re: Hunt v. Southern Baptist Convention, et al.

John,

This delay seems unreasonable to us.

May we set a call to discuss this on Monday. We would like to resolve this without a filing with the Court.

Please let us know what works for you on Monday.

Best regards.

On Fri, Aug 11, 2023 at 12:52 PM John Jacobson <jjacobson@rjfirm.com> wrote:

Patrick:

As I stated in my July 28 letter, Guidepost has engaged an ESI vendor to assist in the identification and collection of responsive documents to Plaintiff's requests. That process is ongoing. After those documents have been collected, they will, of course, need to be reviewed for responsiveness and privilege by counsel. We anticipate that process to be completed around Labor Day, with production of responsive, non-privileged documents soon thereafter.

John

From: Patrick Sanders <patrick.sanders@macgilllaw.com>
Sent: Tuesday, August 8, 2023 9:59 AM
To: DeDe Gibby <DDGibby@rjfirm.com>
Cc: robert.macgill@macgilllaw.com; scott.murray@macgilllaw.com; John Jacobson <jjacobson@rjfirm.com>; Kathy Klein <KKlein@rjfirm.com>; mintz@mintzandgold.com; mccormick@mintzandgold.com; Andy Goldstein <agoldstein@colelawgroup.com>; Todd Cole <tcole@colelawgroup.com>; Nokes, Scarlett <snokes@bradley.com>; Bundren, Brandon <bbundren@bradley.com>; tjresnell@bradley.com; gbesen@bradley.com; gmarchetti@tjmlaw.com; Matt Pietsch <matt@tjmlaw.com>
Subject: Re: Hunt v. Southern Baptist Convention, et al.

John,

We continue to wait on Guidepost to produce documents. Will you commit to supplementing your discovery responses along with a full and complete document production by August 11?

If you are unable to provide supplemental discovery responses and a full and complete production by August 11, we will understand that we are at issue on these topics and will need to schedule a call next week to discuss the issues.

Best regards,

Patrick Sanders
Associate

Associate

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On Fri, Jul 28, 2023 at 3:21 PM DeDe Gibby <DGibby@rffirm.com> wrote:

Counsel,

Please see attached correspondence from John Jacobson in the referenced matter.

Thank you,
DeDe

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